

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION  
BUREAU, et al.

Plaintiffs,

vs.

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC), et al.

Defendants, and

STRATEGIC ESOP, et al.,

Relief Defendants.

Case No. 1:24-cv-00040-EAW-MJR

**DECLARATION OF ALEXANDER D. WALL IN SUPPORT OF RECEIVER'S  
MOTION FOR AN ORDER TO SHOW CAUSE WHY RECEIVERSHIP DEFENDANT  
FIDELIS LEGAL SUPPORT SERVICES, LLC AND RELIEF DEFENDANT CAMERON  
CHRISTO SHOULD NOT BE HELD IN CIVIL CONTEMPT**

I, Alexander D. Wall, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am counsel to Thomas W. McNamara, the Court-appointed receiver (the "Receiver"), in the above-captioned action. I have personal knowledge of the facts set forth in this Declaration and if called as a witness, I could and would competently testify to the facts stated herein.

2. I submit this Declaration in connection with the Receiver's Motion for an Order to Show Cause Why Receivership Defendant Fidelis Legal Support Services, LLC and Relief Defendant Cameron Christo Should Not Be Held in Civil Contempt.

3. Attached hereto as Exhibit 1 is a true and correct copy of a collection of text messages, which was produced to the Receiver by Fidelis Legal Support Services, LLC, and

which was received into evidence as Receiver's Hearing Exhibit REC091 for purposes of the evidentiary hearing of January 23-24, 2025.

4. Attached hereto as Exhibit 2 is a true and correct copy of an email exchange dated January 3, 2022, which was produced to the Receiver by Fidelis Legal Support Services, LLC, and which was received into evidence as Receiver's Hearing Exhibit REC092 for purposes of the evidentiary hearing of January 23-24, 2025.

5. Attached hereto as Exhibit 3 is a true and correct copy of an email exchange dated December 12-14, 2022, which was produced to the Receiver by Fidelis Legal Support Services, LLC, and which was received into evidence as Receiver's Hearing Exhibit REC093 for purposes of the evidentiary hearing of January 23-24, 2025.

6. Attached hereto as Exhibit 4 is a true and correct copy of the transcript of the evidentiary hearing (day 2) of January 24, 2025.

Executed this 5th day of February, 2025, in San Diego, California.

/s/ Alexander D. Wall  
Alexander D. Wall